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Attorneys for Plaintiffs and Counterclaim Defendants  
Michael F. Reeder and Pamela O'Keefe,  
Trustee for the Jordan Grace Reeder Irrevocable Trust  
and Trustee for the Darby Leigh Reeder Irrevocable Trust

UNITED STATES DISTRICT COURT  
DISTRICT OF NEVADA, NORTHERN DIVISION

MICHAEL F. REEDER,

Plaintiff,

v.

UNITED STATES OF AMERICA,  
Defendant.

PAMELA M. O'KEEFE, as  
Trustee for the JORDAN  
GRACE REEDER  
IRREVOCABLE TRUST,

Plaintiff,

v.

UNITED STATES OF  
AMERICA,  
Defendant.

Civil No.: 3:15-cv-00129-MMD  
WGC

**JOINT STIPULATION TO  
EXTEND THE BRIEFING  
SCHEDULE FOR THE UNITED  
STATES' MOTION FOR  
SUMMARY JUDGMENT;  
[PROPOSED] ORDER**

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14 AND RELATED  
15 COUNTERCLAIMS  
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17 COMES now Plaintiffs and Counterclaim Defendants Michael F. Reeder  
18 (“Reeder”) and Pamela O’Keefe, as Trustee of the Jordan Grace Reeder  
19 Irrevocable Trust, dated April 15, 1993 (“JGR Trust”) and the Darby Leigh Reeder  
20 Irrevocable Trust (“DLR Trust”), Defendant and Counterclaimant, United States of  
21 America (“United States”), Bank of America, N.A. and Heritage Bank of Nevada,  
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23 by and through their undersigned counsel, and submit a Joint Stipulation to extend  
24 the briefing dates with respect to the Motion for Summary Judgment which was  
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1 filed by the United States of America ("United States") with this Court on May 1,  
2 2018 [ECF 65].

3 The parties have agreed to the date of June 22, 2018 for Plaintiffs and  
4 Counterclaim Defendants to file an opposition to the United States' Motion for  
5 Summary Judgment.  
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7 The parties have agreed to the date of July 23, 2018 for the United States to  
8 file a Reply.  
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10 This case has involved a significant amount of discovery thus making the  
11 briefing process much more time consuming. Furthermore, Plaintiffs and  
12 Counterclaim Defendants have made a global settlement offer to the United States,  
13 which is under consideration by the United States. The parties will apprise the  
14 Court if settlement is reached.  
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18 PANITZ & KOSSOFF, LLP  
19

20  
21 DATED: May 4, 2018

/s/Barbara E. Lubin

22 BARBARA E. LUBIN  
23

24 PANITZ & KOSSOFF, LLP

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Attorneys for Plaintiffs and  
Counterclaim Defendants

RICHARD E. ZUCKERMAN  
Principal Deputy Assistant Attorney General

DATED: May 4, 2018

/s/Henry C. Darmstadter  
HENRY C. DARMSTADTER  
Trial Attorney, Tax Division  
U.S. Department of Justice  
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(202) 307-6481

DAYLE ELIESON  
United States Attorney  
District of Nevada  
*Of Counsel*

IT IS SO ORDERED:



UNITED STATES DISTRICT COURT  
JUDGE

DATED: May 7, 2018

**CERTIFICATE OF SERVICE**

I am a citizen of the United States and a resident of the County aforesaid; I am employed in the office of a member of the bar of this Court at whose direction the following service was made. I am over the age of eighteen years and not a party to the within entitled action; my business address is 5743 Corsa Avenue, Suite 208 Westlake Village, California 91362.

On May 4, 2018, I served the within **JOINT STIPULATION TO EXTEND THE BRIEFING SCHEDULE FOR THE UNITED STATES' MOTION FOR SUMMARY JUDGEMENT: [PROPOSED ORDER]** on the interested parties, by scanning and emailed the document as well as placing true copies thereof enclosed in sealed envelopes and sent via Federal Express, Overnight Delivery addressed as follows:

Henry C. Darmstadter, Trial Attorney  
Tax Division - US Department of Justice  
Ben Franklin Station  
PO Box 683  
Washington DC 20044-0683

Nathan F. Smith  
Malcolm & Cisneros  
2112 Business Center Drive  
Irvine, CA 92612

Mark G. Simons  
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71 Washington Street  
Reno, NV 89503

I declare under penalty of perjury, under the laws of the State of California, that the foregoing is true and correct, and was executed at Westlake Village, California on November 27, 2017.

/s/ Jeanne Melancon  
Jeanne Melancon, Paralegal